

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,
individually and on behalf of a class of all others
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**SECOND STATUS UPDATE REGARDING PLAINTIFFS' FOURTH REQUEST FOR
PRODUCTION OF DOCUMENTS**

Plaintiffs' respectfully submit this second status report with respect to Plaintiffs' Fourth Request for Production of Documents and RFP 76. In their previous status report filed on February 12, 2021 (ECF No. 81), Plaintiffs advised the Court that the parties have made substantial progress in reaching an agreement with Defendants as to most of Plaintiffs' Fourth Requests for Production of Documents and RFP 76, but had not reached an agreement on RFP 88, which seeks documents concerning the Erie Crime Analysis Center.

Since the February 12 status report, the parties have continued their discussions concerning RFP 88, and Defendants have produced certain sample reports responsive to this request, but the parties still have not reached an agreement as to this request. In addition, on February 26, Plaintiffs took the deposition of Tracy Masiello, a crime analyst for the Buffalo Police Department who works closely with the Erie Crime Analysis Center. During the deposition, Ms. Masiello testified about a number of categories of documents responsive to the Fourth Requests for Production of Documents which have not yet been produced and the parties will need to discuss.

Accordingly, Plaintiffs request an additional two weeks to continue conferring with Defendants concerning the Fourth Requests for Production of Documents and RFP 76 in order to narrow the issues to be presented to the Court. Defendants have advised Plaintiffs that they consent to this request.

Dated: March 1, 2021

Respectfully Submitted,

/s/ Keisha A. Williams

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CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2021, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Jordan Joachim